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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO: 15-392 RS
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME AND
)	PROPOSED ORDER
v.)	
)	
RYAN CARDENAS,)	
)	
Defendant.)	
)	
)	

The parties request that the time between February 16, 2016, and March 1, 2016, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B). The government has produced discovery to defense counsel, who is continuing to review it with her client. Additionally, the parties are investigating the possible referral of defendant to the Conviction Alternatives Program. Excluding time until March 1, 2016, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO STIPULATED.

DATED: February 17, 2016

/s/
BENJAMIN KINGSLEY
Assistant United States Attorney

DATED: February 17, 2016

/s/
CANDIS MITCHELL
Counsel for Defendant Ryan Cardenas


STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
CR 15-362 RS

1 [PROPOSED] ORDER

2 The Court finds that the exclusion of the period from February 16, 2016, to March 1, 2016, from
3 the time limits applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the
4 continuance outweigh the interests of the public and the defendant in the prompt disposition of this
5 criminal case; and that the failure to grant the requested exclusion of time would deny counsel for the
6 defendant and for the government the reasonable time necessary for effective preparation and of
7 counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice.
8 *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

9 IT IS SO ORDERED.

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11 DATED: 2/18/16

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13 HON. RICHARD SEEBORG
14 UNITED STATES DISTRICT JUDGE
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